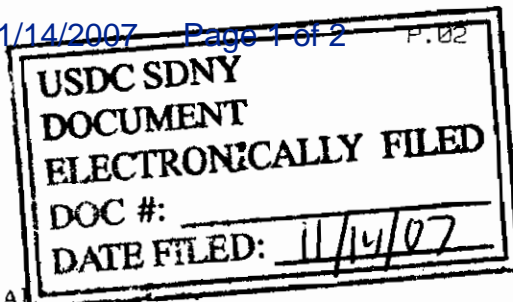




STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL



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Via Facsimile (212) 805-7906

November 13, 2007

The Honorable Denny Chin
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1020
New York, New York 10007-1581

Re: Jones v. Carpinello, et al., 07 Civ. 7589 (DC)

Dear Judge Chin:

I am an Assistant Attorney General in the Office of Andrew M. Cuomo, Attorney General of the State of New York and have been assigned to represent the defendants, current and/or former New York state employees, who have requested representation from my office pursuant to N.Y. Public Officers Law § 17 in the above Section 1983 matter brought by incarcerated *pro se* inmate Glynn Jones.

I am still in the process of receiving requests for representation from the 20 named defendants in this action and, to the extent they have signed and returned F.R.C.P. 4 waiver of service of summons forms, their answers would ordinarily be due at different times over approximately the course of the next month. It is anticipated that all or some of the defendants will be moving to dismiss, but I am still in the process of obtaining background materials that may determine whether given individual defendants move to dismiss or answer.

To avoid the filing and service of numerous responses at different times by defendants, it is respectfully requested that the defendants who have received and accepted service of process and requested representation from my office be granted until January 14, 2008 in which to jointly answer or otherwise respond. This should allow sufficient time for all defendants that plaintiff is proceeding against to receive copies of the summons and complaint, execute waivers and request representation from my office. If Your Honor wishes, I can update the Court on the status of these requests by December 19, 2007. It is expected that my office will advise defendants who request representation from my office to accept service by mail rather than requiring plaintiff to personally serve them. At this time, I have not ascertained whether any of the named defendants are no longer New York state employees.

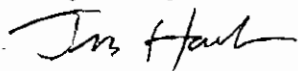
While this extension is longer than what I typically request, the number of defendants and different state agencies involved make this a complicated matter that will take more time than usual to coordinate. For these reasons, it is also respectfully requested that Your Honor grant permission to defendants to exceed Your Honor's individual rules regarding page limits of memoranda of law and allow any joint memoranda to be up to 40 pages. Otherwise it may be necessary to, for

Approved
So ordered
WSDJ
11/14/07

example, submit separate memoranda of law for defendants employed by different agencies.

I have not requested plaintiff's permission for this revision of the applicable deadlines because he is currently incarcerated and it is likely that a response, if any, will be received after some deadlines expire. This is the first request for an extension in this matter. The request does not appear to impact any other previously scheduled deadlines.

Respectfully submitted,



Jeb Harben
Assistant Attorney General

cc: Glynn Jones
DIN # 84-A-7585
Sing Sing Correctional Facility
354 Hunter Street
Ossining, New York 10562-5442